

WILSHIRE LAW FIRM
Thiago Coelho, SBN 324715
thiago@wilshirelawfirm.com
Binyamin I. Manoucheri, SBN 336468
binyamin@wilshirelawfirm.com
Jasmine Behroozan, SBN 325761
jasmine@wilshirelawfirm.com
3055 Wilshire Blvd., 12th Floor
Los Angeles, California 90010
Tel: +213.381.9988
Fax: +213.381-9989

Attorneys for Plaintiff
VIVIAN SALAZAR

MORGAN, LEWIS & BOCKIUS LLP
Kathy H. Gao, SBN 259019
kathy.gao@morganlewis.com
300 South Grand Avenue
Twenty-Second Floor
Los Angeles, CA 90071-3132
Tel: +1.213.612.2500
Fax: +1.213.612.2501

Attorneys for Defendant
AE OUTFITTERS RETAIL CO.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

VIVIAN SALAZAR, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

AEO OUTFITTERS RETAIL CO., a
Delaware Corporation; and DOES 1 to 10,
inclusive,

Defendants.

Case No. 2:21-cv-01810-JAM-JDP

**JOINT STIPULATION TO EXTEND
TIME FOR DEFENDANT AEO
OUTFITTERS RETAIL CO. TO
RESPOND TO PLAINTIFF'S
COMPLAINT (L.R. 144)**

Complaint Served: October 4, 2021
Current Response Date: December 31, 2021
New Response Date: January 31, 2022

1 WHEREAS, Plaintiff Vivian Salazar (“Plaintiff”) filed her Complaint on September 30,
2 2021;

3 WHEREAS, through a prior stipulation between Plaintiff and Defendant AE Outfitters
4 Retail Co. (“Defendant”) (Plaintiff and Defendant collectively referred to as the “Parties”),
5 Defendant’s current responsive pleading deadline is December 31, 2021;

6 WHEREAS, Defendant is in the process of assessing Plaintiff’s allegations in this action
7 which is a time-consuming process given the highly technical nature of the allegations relating to
8 the accessibility of Defendant’s website. Defendant will need more time to complete its
9 assessment of Plaintiff’s allegations prior to responding to Plaintiff’s Complaint; and

10 WHEREAS, the Parties’ respective counsel have met and conferred and stipulated to an
11 extension of time for Defendant to respond to Plaintiff’s Complaint.

12 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through the
13 Parties’ respective counsel as follows:

14 Defendant’s deadline to file a responsive pleading to Plaintiff’s Complaint shall be
15 extended to January 31, 2022.

16 Dated: December 28, 2021

WILSHIRE LAW FIRM

17 By /s/ Thiago Coelho

18 Thiago Coelho
Attorney for Plaintiff
VIVIAN SALAZAR

19 Dated: December 28, 2021

MORGAN, LEWIS & BOCKIUS LLP

20 By /s/ Kathy H. Gao

21 KATHY H. GAO
22 Attorney for Defendant
AE OUTFITTERS RETAIL CO.

SIGNATURE ATTESTATION

I hereby attest that all signatories listed above, on whose behalf this stipulation is submitted, concur in the filing's consent and have authorized the filing.

Dated: December 28, 2021

MORGAN, LEWIS & BOCKIUS LLP

By /s/ Kathy H. Gao

KATHY H. GAO

Attorney for Defendant

AE OUTFITTERS RETAIL CO.

ORDER

After considering the Parties' stipulation and good cause appearing, IT IS HEREBY ORDERED that: Defendant's deadline to respond to Plaintiff's Complaint shall be extended to January 31, 2022.

IT IS SO ORDERED.

Dated: January 3, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ

UNITED STATES DISTRICT COURT JUDGE